

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JOHN BOSHEARS, on behalf of themselves  
and all others similarly situated,

Plaintiff,

v.

PEOPLECONNECT, INC., a Delaware  
Corporation,

Defendant.

NO. 2:21-cv-01222-MJP

JOINT MOTION AND PROPOSED  
ORDER TO EXTEND DEADLINES

NOTE ON MOTION CALENDAR:  
November 6, 2023

Pursuant to Fed. R. Civ. P. 26, Plaintiff Boshears and Defendant PeopleConnect, Inc., by and through their undersigned attorneys, respectfully request the Court to extend the deadline for the Parties to complete arbitration-related discovery to February 2, 2024; extend the deadline for Defendant to answer or otherwise plead to March 18, 2024; extend the deadline for Plaintiff to file any response brief to April 22, 2024; and extend the deadline for Defendant to file any reply brief to May 6, 2024.

1. On September 5, 2023, the Court ordered the Parties to complete arbitration-related discovery by December 4, 2023. Dkt. 63. The Court also set deadlines for Defendant to answer or

JOINT MOTION AND PROPOSED ORDER TO EXTEND  
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1 otherwise respond by January 18, 2024; for Plaintiff to file any response brief by February 22,  
2  
3 2024; and Defendant to file any reply brief by March 7, 2024. *Id.*

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5 2. The Parties have been diligently pursuing arbitration-related discovery. On  
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7 September 7, 2023, Defendant served written discovery on Plaintiff. On October 5, 2023, Plaintiff  
8  
9 served written discovery on Defendant. Plaintiff responded on October 9, 2023, and served  
10  
11 supplemental responses on October 18, 2023. Defendant responded on November 3, 2023. The  
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13 Parties have met and conferred regarding Plaintiff's responses and about the deposition of Plaintiff.  
14

15 3. On October 20, 2023, Defendant served third-party subpoenas on Plaintiff's  
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17 counsel. Plaintiff and Defendant, having met and conferred about the third-party subpoenas, have  
18  
19 agreed that the Parties should wait to negotiate the agreed upon scope of any third-party subpoenas  
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21 and to schedule any third-party depositions until after Plaintiff has been deposed.  
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23 4. Fed. R. Civ. P. 26 provides the Court with the discretion to set the schedule for  
24  
25 discovery.  
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27 5. The Parties thus jointly request that this Court extend the deadlines in its  
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29 September 5, 2023 Scheduling Order by 60 days so that the Parties may have adequate time to  
30  
31 negotiate the scope of the third-party subpoenas and take the third-party depositions after the  
32  
33 Plaintiff has been deposed.  
34

35 **WHEREFORE**, Plaintiff and Defendant respectfully request the Court to extend the  
36  
37 deadline for the Parties to complete arbitration-related discovery to February 2, 2024; extend the  
38  
39 deadline for Defendant to answer or otherwise plead to March 18, 2024; extend the deadline for  
40  
41 Plaintiff to file any response brief to April 22, 2024; and extend the deadline for Defendant to file  
42  
43 any reply brief to May 6, 2024.  
44  
45

DATED this 6th day of November, 2023.

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*Attorneys for Defendant PeopleConnect, Inc.*

IT IS SO ORDERED.

DATED: November 7, 2023



Marsha J. Pechman  
United States Senior District Judge